

**UNITED STATES DISTRICT COURT  
For The Southern District Of New York**

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**COUNTER TERRORIST GROUP US,  
COUNTErr GROUP, and J. K. IDEMA,**

*Plaintiffs,*

**v.**

**MAXIM MAGAZINE, aka MAXIM,  
STUFF MAGAZINE, aka STUFF,  
DENNIS STUFF, INC.,  
DENNIS PUBLISHING, INC.,  
ALPHA MEDIA GROUP,  
QUADRANGLE CAPITAL PARTNERS,  
QUADRANGLE GROUP LLC,  
FELIX DENNIS, ED NEEDHAM,  
GARY FRENCH, STEPHEN COLVIN,  
SEAMUS McGRAW, LAURA WINTER,  
MOHAMMED NAHIM DAWARI,  
ABDUL BASSET BAKTYARI,  
JOHN DOES 1-7,**

*Defendants.*

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**Plaintiffs'**

**Request for Extension of Time  
To Serve Summons  
and Complaint**

**Case # 07 CV 9827 (DAB)**

**Assigned Judge:**

Honorable Deborah A. Batts

**MOTION FOR EXTENSION OF TIME TO SERVE SUMMONS AND COMPLAINT**

**NOW COMES**, Plaintiffs, pursuant to Rule 4 Summons (m) of the Federal Rules of Civil Procedure, and hereby requests that this Honorable Court extend the time to serve the summons and complaint on certain defendants in this case for an additional 90 days. This request is based upon the unavailability of certain defendants for service.

1. The time to serve the summons and complaint (within 120 days) will expire on midnight March 4<sup>th</sup> 2008. Plaintiffs require 90 additional days to insure that the remaining summonses and complaints have valid service.

2. Plaintiffs have made a diligent effort to serve these defendants and hired numerous process servers to locate and serve them.

3. **Dennis Felix** is unavailable at this time. We were informed today by his attorney that he is currently in England. Although the attorney accepted service on behalf of several other defendants, he advised our process server that Mr. Felix would have to be served personally in London, England.

4. **Ed Needham** is unavailable at this time. Additionally, the attorney notified us that Mr. Needham was also now living in England, having returned there to open a business. Therefore we will need to serve Mr. Needham in London, England.

5. **Laura Winter** is also unavailable at this time. We have been informed by other sources that she has married and as a result of that marriage has also relocated to London, England. Therefore we will need to serve Ms. Winter in London, England.

6. **Dennis Publishing Inc.** recently changed its name to Dennis Publishing LTD and moved to England. According to Mr. Harry Kenner, *Esquire* at Dennis Stuff Inc. we will need to serve Dennis Publishing in London.

7. **Gary French** cannot be located. We have hired a variety of investigators who eventually tracked him to a new job in New York City. Unfortunately he just left that job and was supposedly now working at Bravo Network. Bravo has no listing for Gary French and we have hired another investigator to attempt to locate him.

8. **Seamus McGraw** lives on a remote mountain in Pennsylvania where we sent a PA State Constable to locate him after providing satellite images and maps of his location. Unfortunately the Constable was not able to serve Mr. McGraw before he left for Florida. Mr. McGraw did tell the Constable via cell phone that he would return in mid-March, and that Maxim had agreed to represent him.

9. **MOHAMMED NAHIM DAWARI**, is a “former” member of the Taliban who lives in Afghanistan. The Summons and Complaint were dispatched to Afghanistan more than 60 days ago. As of yet our agent in Afghanistan cannot locate Mr. Dawari.

10. **ABDUL BASSET BAKTYARI** is a “former” member of the Taliban. He still has Taliban links and works with the Taliban. To categorize him as dangerous is an understatement. As of yet our agent in Afghanistan cannot safely serve Mr. Baktyari.

11. The service of process in this case has been time consuming and costly. Plaintiffs have made a diligent effort to obtain service on all defendants. The attorneys for plaintiffs and the plaintiffs both request the time for service for the above defendants be extended for 90 days so we can serve the remaining defendants and confirm that all defendants have been properly served to avoid time consuming issues for this Court in the future.

**WHEREFORE**, plaintiffs request this Honorable Court, or the Clerk of Courts, enter an order extending the time to perfect service on the following defendants for an additional 90 days from today:

**DENNIS PUBLISHING, INC.,  
FELIX DENNIS,  
ED NEEDHAM,  
GARY FRENCH,  
SEAMUS McGRAW,  
LAURA WINTER,  
MOHAMMED NAHIM DAWARI, and  
ABDUL BASSET BAKTYARI**

and other relief which this Honorable Court deems just and proper.

This 4th day of March 2008,

\_\_\_\_s/\_\_\_\_\_  
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